

Federal Defenders
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201
Tel: (718) 330-1200 Fax: (718) 855-0760

David Patton
*Executive Director and
Attorney-in-Chief*

Deirdre D. von Dornum
Attorney-in-Charge

January 8, 2021

Via ECF

The Honorable Dora L. Irizarry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: United States v. Anthony Rodriguez
19-cr-460 (DLI)**

Your Honor:

We represent Mr. Rodriguez on the above indictment, charging him with being a felon in possession pursuant to 18 U.S.C. § 922(g). Mr. Rodriguez, who suffers from diabetes and high cholesterol, has been in pretrial detention at the Metropolitan Detention Center (MDC) since his initial appearance in September 2019. He has now completed the one-year sentence for a parole violation that he was serving at the time of his arrest.

We write to respectfully request that the Court order Mr. Rodriguez released on a \$100,000 personal recognizance bond, co-signed by his wife, his brother and his mother, and under home confinement with location monitoring at his mother and brother's residence in Brooklyn. Mr. Rodriguez's mother, Dabryne Bowman would also serve as a third-party custodian, obligating her to report any bond violations to the Court. The government has interviewed the proposed sureties and does not oppose Mr. Rodriguez's release on this combination of strict conditions and strong sureties

Pretrial Services has also interviewed and completed background checks on the proposed sureties. Pretrial likewise finds that the proposed bail conditions will ameliorate any risk of flight or danger to the community, and recommends Mr. Rodriguez's release, as set forth in the addendum to the Pretrial Report submitted to the Court yesterday.

The information regarding the proposed sureties, which is set forth in Pretrial's addendum, is as follows:

- Mr. Rodriguez's wife, Hope Pascal Rodriguez, lives in Brooklyn and is employed as a sales manager at Macy's Downtown Brooklyn, with an annual salary of \$67,000.

- Mr. Rodriguez's brother, Vernon Cabble, lives in Brooklyn with their mother and is employed as a Safety Monitor at Manhattan Psychiatric, earning an annual salary of \$45,000.

- Mr. Rodriguez's mother, Dybrine Bowman, receives mental health disability benefits of \$700 per month. As noted, however, Ms. Bowman affirmed she would be willing to act as third-party custodian, and Mr. Rodriguez would be living with her (and Mr. Cabble) at her residence at 2155 Pitkin Avenue, Apt. 3C, Brooklyn, New York.

We thank the Court for its consideration.

Respectfully Submitted,

/s/

Kannan Sundaram

Tamara Giwa

Attorneys for Anthony Rodriguez

cc: Andrew Wang
Assistant U.S. Attorney

Chijioke Ezenyilimba
Melony Bedford
U.S. Pretrial Services